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February 22, 2001

VIA HAND DELIVERY

Magalie Salas Roman, Esq.
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

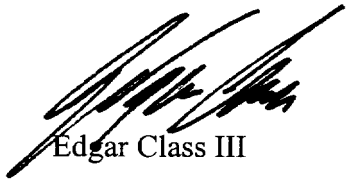
Re: **Comments**
ET Docket No. 00-258
Education Service Center Region 9 and the Texas ITFS Educational Community

Dear Ms. Salas:

On behalf of the Education Service Center Region 9 and the Texas ITFS Educational Community, please accept an original, four copies, and a stamp-return copy of the attached Comments in ET Docket No. 00-258. These Comments are filed in response to the *Notice of Proposed Rule Making*, which was released on January 5, 2001.

If you have any questions, please contact the undersigned at (202) 639-5639. Thank you for you attention to this matter.

Respectfully submitted,



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cc: Dr. Ron Preston

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, including Third Generation Wireless Systems	)	ET Docket No. 00-258

To the Commission:

JOINT COMMENTS OF EDUCATION SERVICE CENTER REGION 9 AND THE TEXAS ITFS EDUCATIONAL COMMUNITY

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February 22, 2001

SUMMARY

The ITFS/MDS band's importance to America's schools has increased exponentially now that schools are upgrading distance learning programs to broadband two-way usage with the Commission's own blessing as handed down in its Two-Way Order. This transformation of ITFS/MDS systems will ensure that rural and urban schools will be able to offer exemplary curriculum to inner city and rural students that would otherwise only have access to the failed one room schoolhouse approach to multidisciplinary education. The 3,800 square mile coverage area of an ITFS/MDS system makes it ideal for bringing broadband "pipes" to rural schools and even students' homes that may be miles from a main road. Because only 5% of cable modem and DSL service is deployed in rural areas of Texas, Education Service Center Region 9 and the Texas ITFS Educational Community are alarmed that one of the Commission's proposed options in this proceeding is the eviction of these important educational programs from the ITFS/MDS band.

The Commission has a mandate to safeguard and encourage broadband deployment to rural America, including all schools therein. Internet-based distance learning curriculum brings the world's experts and resources to students located anywhere. If rural students do not have the broadband connections needed to support the feature rich, multimedia design of these programs, the educational divide between urban and rural schools will continue to widen. Weighing its congressional mandates to take actions which further rural broadband deployment and the Bush Administration's top priority of ensuring that every student has access to the highest quality education, the Commission cannot logically justify ignoring these responsibilities and destroying ITFS/MDS to accommodate 3G wireless service when it has sufficient alternate spectrum available. Doing otherwise would be

discriminatory and would constitute a technical preference in violation of the Commission's proscription against such action.

As already identified in the Commission staff's own Interim Report and because of incumbent use, the Commission cannot require sharing of the band with 3G service due to technical barriers.

Relocation is also not an option. The Commission cannot displace current ITFS/MDS operations without moving them to comparable spectrum. Only spectrum below 3 GHz provides propagation characteristics similar to current use that will allow the same coverage area necessary for reaching rural areas, including classrooms and students' homes. No unencumbered, contiguous spectrum block below 3 GHz and of the same bandwidth is available for relocation of ITFS/MDS.

In reliance on the Commission and its two-way proceedings, the ITFS community has been working with its MDS partners to redevelop the spectrum for two-way fixed broadband usage, including system reengineering and filing of applications. These reengineered ITFS/MDS systems are the only hope the State of Texas has for ensuring that enhanced educational opportunities are extended to every corner of the state.

The ITFS Community urges the Commission not to relocate, reallocate, segment, or otherwise disrupt the existing ITFS/MDS systems and operators in favor of 3G services. Any proposed changes to the ITFS/MDS band would violate congressional mandates, educational priorities of the Bush Administration, spectrum rights of existing licensees and operators, as well as the Commission's own precedents. Existing cellular and other alternative spectrum the Commission has already identified for possible reallocation to 3G service is at the Commission's disposal, provides a less discriminatory alternative, and avoids the legal, political, and policy dilemmas that would result from revamping the ITFS/MDS band.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of		
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Amendment of Part 2 of the Commission's Rules to	)	
Allocate Spectrum Below 3 GHz for Mobile and	)	ET Docket No. 00-258
Fixed Services to Support the Introduction of New	)	
Advanced Wireless Services, including Third	)	
Generation Wireless Systems	)	

To the Commission:

JOINT COMMENTS OF EDUCATION SERVICE CENTER REGION 9 AND THE TEXAS ITFS EDUCATIONAL COMMUNITY

Education Service Center Region 9 and the Texas ITFS Educational Community listed on the attached Appendix A (collectively, the "ITFS Community") hereby submit their joint comments on the *Notice of Proposed Rulemaking* ("*Notice*") in the above-captioned proceeding.[1] Members of the ITFS Community are licensees or applicants for ITFS stations, and some have held licenses and operated ITFS systems for many years. In this proceeding, the Commission seeks to allocate spectrum for new advanced wireless services, including third generation ("3G") wireless services. Among other

[1] Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Services, including Third Generation Wireless Systems, *Notice of Proposed Rulemaking*, FCC 00-455 (rel. January 5, 2001) ("*Notice*").

candidate bands, the Commission seeks comment on the use of spectrum currently licensed to Instructional Television Fixed Service ("ITFS"), Multichannel Multipoint Distribution Service ("MMDS"), and Multipoint Distribution Service ("MDS")[2] in the 2150 – 2162 MHz and 2500-2690 MHz bands ("ITFS/MDS band") for the provision of advanced wireless services. For all of the reasons below, the ITFS Community urges the Commission not to reallocate any portion of the ITFS/MDS spectrum for 3G.

I. THE COMMISSION SHOULD SAFEGUARD EXISTING USE OF THE ITFS/MDS BAND BECAUSE IT IS ESSENTIAL FOR GIVING RURAL STUDENTS ACCESS TO INTERNET-BASED DISTANCE LEARNING PROGRAMS THAT WILL ONLY BECOME MORE BANDWIDTH INTENSIVE.

The Commission has a mandate from Congress to ensure the ubiquitous deployment of broadband services to schools, businesses, and homes throughout rural and urban America:

> Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including...advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.[3]

> The Commission shall establish competitively neutral rules to enhance, to the extent technically feasible and economically reasonable, access to advanced telecommunications and information services for all public and nonprofit elementary and secondary school classrooms...[4]

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2 All references to MDS contained herein also include MMDS.

3 47 U.S.C. § 254(b)(3).

4 47 U.S.C. § 254(h)(2).

President George W. Bush's top priority is to ensure that every child in the United States has access to a quality education.[5] In his educational reform plan, President Bush encourages schools to "use technology as a tool to improve academic achievement."[6] Because the development of Commission spectrum management policy has the potential to frustrate this executive agenda, the Commission must take into account the consequences that disruption of ITFS/MDS incumbents may have on education.

By bringing broadband access to communities throughout both rural and urban areas of Texas and the United States, ITFS/MDS providers such as Worldcom, Sprint, and Nucentrix Broadband Networks are providing the infrastructure and service to ensure that "no child is left behind." In his State of the State Address, Texas Governor Rick Perry recognized the role ITFS/MDS broadband service can serve in elevating at risk schools to exemplary status:

> Technology is already transforming the classroom. A few months ago I visited Travis High School on the south side of Austin. A school with an 80 percent minority enrollment, many of the children coming from disadvantaged homes. [T]hrough the vision of a dedicated administration, technology coordinator, and corporate sponsors, more students at Travis High are succeeding due to the wonder of leading technologies such as the wireless Internet, multimedia and teleproduction.[7]

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5 Remarks by the President at Swearing-in Ceremony for Dr. Roderick Paige as Secretary of Education, Dept. of Education, Washington D.C. (Jan. 24, 2001), http://www.whitehouse.gov/news/releases/20010124-3.html.

6 President George W. Bush, *No Child Left Behind* (Jan. 23, 2001) at 22, http://www.whitehouse.gov/news/reports/no-child-left-behind.pdf.

7 Governor Rick Perry, "State of the State Address" (Jan. 24, 2001), http://www.governor.state.tx.us/Perry/75r/LtGov/pr/p01242001b.htm. Nucentrix Broadband Networks, Inc., an MDS operator/licensee in the greater Austin, Texas metropolitan area, donated its broadband wireless Internet service to Travis High School. The wireless network currently provides broadband connectivity to a network of over 400

Indeed, "[h]igh-speed Internet connectivity is becoming a necessity."[8] Without this access, "a new gap is emerging between those with rapid broadband Internet capabilities and those without."[9]

Broadband Internet connections are even more important in rural areas for providing equal access to exemplary educational opportunities:

> Centuries ago, when knowledge was conveyed exclusively through an oral tradition, location was everything. With the advent of written texts, students were freed from the need to attend lectures...however, other important functions, including tutoring, counseling, and evaluation, remained essentially face-to-face activities.
>
> Now just as books (and cars) have weakened the links between distance and learning in the past, today new information technologies can almost break them.[10]

As Senator Bob Kerrey succinctly stated: "The legacy of the one-room schoolhouse is holding back the one-world classroom."[11]

Emerging Internet-based distance learning programs currently offer multimedia course programs which include audio and video of lectures and movies, online textbooks, lecture notes and overheads, pictures, virtual office hours, chat rooms, live computer programs, links to on-line

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personal computers.

8 Commissioner Brett Perlman, "Brett Perlman: Internet brings quiet revolution to Texas," *The Dallas Morning News* (Sept. 6, 2000), http://www.dallasnews.com/editorial/viewpoints/163688_perlman_06edi..html.

9 Miguel Llanos, "Students need more Net, panel argues," *MSNBC.com* (Dec. 19, 2001), http://www.msnbc.com/news/505078.asp?0nm=T19M.

10 David J. McArthur and Matthew W. Lewis, *Untangling the Web, Applications of the Internet and Other Information Technologies to Higher Learning* (1998) at 23 ("*Untangling the Web*").

11 Miguel Llanos, "Students need more Net, panel argues," *MSNBC.com* (Dec. 19, 2001), http://www.msnbc.com/news/505078.asp?0nm=T19M.

resources, class calendars, homework assignments, electronic archives, and exams.[12] These features are merely enhancements to distance learning heretofore conducted over ITFS/MDS systems, which were limited to one-way television broadcast courses before the FCC's Two-Way Order: "Internet-based distance-learning courses, in short, can mix the graphics and video of instructional TV with a much more intimate style of interactive mentoring than teleconferencing ever could. Therefore, it should provide substantially richer learning experiences for students than the current generation does."[13]

Because of ITFS, and more importantly due to the Commission's authorization of two-way usage of ITFS, students and adult learners in rural and traditionally underserved areas can have access to the same educational opportunities as those in better served metropolitan areas.[14] Students and teachers in these traditionally underserved areas are freed from the need to travel great distances to meet face-to-face, saving time and money and conserving resources. In urban areas, ITFS gives students in all school districts access to the latest instructional materials at all levels, helping to even the playing field and promote learning opportunities. ITFS also helps schools leverage their

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12 *Untangling the Web* at 15-16.

13 *Untangling the Web* at 17; *See also* "Textbooks Go Online," *The Journal*, (Feb. 2001), http://www.thejournal.com/magazine/vault/A3294.cfm.

14 Without distance learning programs and newer educational learning programs geared for two way broadband Internet connections over ITFS/MDS, students in primarily rural areas would be deprived of access to the full college preparatory curriculum every student should have. ITFS/MDS is the only way some rural schools have of offering the required courses to their students.

instructional materials and teachers by making both accessible to a much larger number of students than would otherwise be possible.

Even if a local school does not provide distance learning to the community directly, students having broadband Internet access can take full advantage of distance learning offered through other educational organizations. Through the Internet, the University of Texas at Austin offers its "UT High School" program in which students can select from approximately 45 courses, including math, computer science, English, social studies, foreign language and other electives.[15] Students who satisfactorily complete the required curriculum can earn a high school diploma. This program was accredited by the Texas State Board of Education in late 1998.[16]

The Commission's decision to allow two-way use of the ITFS/MDS band gave rural areas a critical broadband pipe to the rest of the world so that rural students would have access to the same educational opportunities as their urban peers. To date, cable companies and incumbent local exchange carriers ("ILECs") have respectively deployed only 5% of cable modem and DSL service in rural areas of Texas.[17] This is due to the excessive costs of installing and maintaining wireline infrastructures over long distances in areas of lower population densities.[18] Because ILECs in rural

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15 *See* The University of Texas at Austin Continuing & Extended Education Distance Education Center, http://www.utexas.edu/cee/dec/uths/index.html.

16 *See* The University of Texas at Austin Continuing & Extended Education Distance Education Center, http://www.utexas.edu/cee/dec/uths/index.html.

17 Public Utility Commission of Texas, *Report to the 77th Legislature on Advanced Services in Rural and High Cost Areas* (Jan. 2001) ("*PUC Report*").

18 *Id.* at 44, 60.

Texas cannot provide reliable basic telephone service and maintain existing low technology facilities,[19] it would be ludicrous to assume that these same companies will dedicate the requisite money and resources needed to replace obsolete facilities and completely rewire rural areas in order to provide advanced telecommunications services.

The "last mile" connection to urban and rural residences is primarily controlled by monopolies, which have heretofore largely ignored rural broadband demand.[20] ITFS/MDS operations may be the only way to bypass the rural ILEC bottleneck.[21] Even if ILECs provided ubiquitous wired coverage to rural areas, it is unlikely that any other provider could compete even on a forced resale or unbundled basis, as exemplified by recent announcements of AT&T to abandon local service to Texas and other markets for the same reasons.[22]

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19 Public Utility Commission of Texas, Customer Protection Division, *PUC Update* (Feb. 15, 2001) at 10 (Texas PUC is threatening heavy penalties against ILECs in dozens of rural exchanges for deteriorating service and repeated failures to meet basic quality of service standards. Not only is service to existing customers a problem, but also new service installations can take up to 3 months.).

20 Public Utility Commission of Texas, *Report to the 77th Legislature on Advanced Services in Rural and High Cost Areas* (January 2001) at 22, 30 ("*PUC Report*") (concluding that demand for broadband service is the same in rural areas as in urban areas).

21 FCC Staff Report Issued by the Office of Engineering and Technology, Mass Media Bureau, Wireless Telecommunications Bureau, and International Bureau: *Spectrum Study of the 2500-2690 MHz Band: The Potential for Accommodating Third Generation Mobile Systems,* Interim Report, ET Docket No. 00-232, DA 00-2583, (rel. November 15, 2000) at 22 ("*Interim Report*"); Frank Kelly, "MMDS: The Wireless Alternative for Broadband," *Internet Telephony* (June 2000).

22 Jeremy Pelofsky, "AT&T May Nix Local Service in NY, Texas" *Reuters* (Feb. 7, 2001), http://biz.yahoo.com/rb/010207/dy.html.

Advanced fixed broadband technologies, engineered for use over the ITFS/MDS band, will provide broadband Internet connections to schools and students' homes in the local community and support rapidly emerging multimedia distance learning programs. In reliance on the FCC's *Two-Way Order*, the ITFS Community has been working with their commercial partners to deploy ITFS-based information systems and content for the twenty-first century classroom. Through these efforts, Texas will be able to achieve the vision of President Bush and Governor Perry.

II. BECAUSE THE ITFS/MDS BAND IS CURRENTLY USED TO PROVIDE ADVANCED WIRELESS SERVICES, NO REALLOCATION IS NECESSARY.

The Commission seeks comment on the use of ITFS/MDS spectrum for advanced wireless services.[23] As a threshold matter, it should be emphasized that the ITFS/MDS spectrum is *already* being used for advanced wireless services. As the Commission defines the term, "advanced wireless services" includes data and broadband services provided over fixed networks.[24] The Commission's *Two-Way Order* gives ITFS licensees the flexibility to provide *any* voice, data, or video service to and from fixed locations, including high-speed two-way services such as broadband Internet access.[25] The ITFS/MDS spectrum, then, is already capable of supporting all services except those mobile applications that may fall under the advanced wireless services umbrella. Specifically with regard to 3G mobile applications, the proposals in the *Notice* fall into two broad categories: (i) proposals to

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23 *Notice* at ¶ 62.

24 *Notice* at ¶ 1.

25 *See Report and Order* in MM Docket No. 97-217 at ¶ 6 (1996).

share or segment the ITFS/MDS spectrum in a way that would permit 3G mobile services to coexist with ITFS; and (ii) proposals to relocate ITFS and or MDS licensees to other spectrum to clear the band for 3G mobile services. As demonstrated below, neither course of action is wise or necessary. The Commission instead should accommodate 3G services in one or more of the other bands identified in the *Notice*.

III. AS CORRECTLY CONCLUDED IN THE COMMISSION'S INTERIM REPORT, SHARING OF THE ITFS/MDS BAND WITH 3G SERVICES CURRENTLY IS NOT POSSIBLE.

The Commission's Interim Report correctly concluded that the technical difficulties of mixing 3G and fixed wireless service makes it "difficult to imagine that a mobile allocation can succeed...given the existing uses of the ITFS/MDS band."[26] The Commission also seeks comment on whether a mobile allocation can be grafted onto the ITFS/MDS band as it is currently constituted.[27] Although the ITFS Community does not seek this additional flexibility at present, they have no objection to flexible use in principle, provided that it can be accomplished in a way that protects the existing fixed uses for which the ITFS Community has an ongoing need.

The Two-Way Order was carefully engineered around the enormously difficult technical complexities associated with sharing spectrum between downstream and upstream operations. The rule making process succeeded, in part, due to the restriction of upstream transmitters to fixed locations. If upstream transmitters in the band are allowed to roam, protection of fixed receive sites at the schools, community centers, and hospitals to which ITFS materials are transmitted from distant

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[26] Interim Report at 53.

[27] *Notice* at ¶ 64.

locations may be jeopardized without extensive further review and modification of the existing fixed two-way rules, all of which could lead to additional delay in the deployment of advanced telecommunications services over the ITFS/MDS band. [28]

IV. RELOCATION OF ITFS/MDS INCUMBENTS TO ANOTHER CONTIGUOUS BAND OF COMPARABLE SPECTRUM IS NOT POSSIBLE AND WOULD INTERFERE WITH RURAL BROADBAND DEPLOYMENT AND EDUCATIONAL PRIORITIES.

The *Notice* also seeks comment on the possibility of relocating incumbents as a way to clear the band, or portions of the band, for 3G mobile operations.[29] The propagation characteristics necessary for the ITFS Community and their commercial partners to conduct existing and planned operations in the ITFS/MDS bands cannot be met above 3 GHz due to the decreased coverage area. Therefore, in order to relocate the entire ITFS/MDS band to comparable spectrum, the Commission would have to find a contiguous 190 MHz block of spectrum below 3 GHz. The ITFS Community is aware of no such block of spectrum. Furthermore, vendors would have to reengineer equipment to operate at the reassigned frequencies, possibly halting any research, development, and support of equipment for the existing ITFS/MDS band while they design and test new equipment for use on reassigned frequencies at a deployment date that today cannot be ascertained.

An alternative would be to relocate only part of the ITFS/MDS band. This would necessarily involve the relocation of individual licensees or smaller blocks of spectrum. However, relocation of ITFS licensees in this manner would be disastrous for the ITFS Community. As explained below, such action would result in the demise of ITFS as envisioned by the Commission because piecemeal

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[28] *See Interim Report* at 53.

relocation would disrupt and likely terminate the commercial partnerships that the Commission has gone to great lengths to encourage.

In the 1980s, the Commission took the unusual and creative step of permitting ITFS licensees to lease their excess transmission capacity to commercial service providers.[30] As the Commission correctly foresaw, the result was an explosive growth in the deployment of ITFS systems and utilization of ITFS by educators. Whereas previously, applications had trickled in at the rate of only five per year,[31] by 1991 the Commission was receiving more than 400 applications per year, and the number was doubling each year.[32] Over 90 percent of these applications contained excess capacity leases which provided critical funding for the ITFS facilities and educational activities of the licensees.[33]

The partnership between ITFS and wireless cable was ideal in many respects. At the outset, educators needed one-way video distribution to classrooms and other learning centers, and "wireless cable" was perfectly suited to provide the facilities and services that distance learning required. Today, educators need more than one-way video. They need broadband Internet access in the classroom,

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29 *Notice* at ¶ 65.

30 *Report and Order* in Gen. Docket No. 80-112, 94 F.C.C.2d 1203, 1249-50 (¶ 114) (1983).

31 *Notice of Proposed Rule Making, supra*, 48 Fed. Reg. 29553 at ¶ 10.

32 Amendment of Part 74 of the Commission's Rule With Regard to the Instructional Television Fixed Service, *Notice of Proposed Rule Making*, 8 FCC Rcd 1275, 1276 (¶ 5) (1993).

33 *Id.*

interactive video and videoconferencing, and wide-area networking. Fortunately, the wireless communications industry has also matured, and is focused now on the delivery of two-way services and broadband Internet access, thus retaining an ideal fit with the needs of educators. Thanks to the Commission's foresight and the cooperative efforts of ITFS licensees and their commercial partners, ITFS is poised to be an important educational resource in the twenty-first century.

Relocating ITFS incumbents to make way for 3G services on a site-by-site basis or in piecemeal spectrum blocks would necessarily disrupt the carefully crafted partnerships between ITFS licensees and commercial system operators. The result would be to undo the progress that has been made in the last twenty years, and render the service virtually worthless to educators – and more importantly, to students. For just as it was twenty years ago, all the technology in the world is of no use without the financial resources to construct, operate, and maintain information systems and invest in meaningful content. The ITFS Community does not have the financial and technical resources to bring broadband to the school without the technical, financial, and operational support of the MDS operators and their added bandwidth that makes the system work. The symbiotic relationship with the MDS operator ensures delivery of broadband not only to rural schools, but rural communities as well.

V. REALLOCATION OF SPECTRUM OTHER THAN THE ITFS/MDS BAND WOULD ACCOMMODATE 3G SERVICES AND WOULD AVOID THE LEGAL AND PUBLIC POLICY PROBLEMS THAT WOULD ARISE FROM THE REALLOCATION OF ITFS/MDS.

There is no need for the Commission to engage in the difficult and lengthy administrative process that would surround any attempt to share the ITFS/MDS band between fixed and mobile services or to relocate fixed incumbents to make way for mobile uses. The *Notice* identifies

approximately 265 MHz of spectrum that can be allocated to 3G mobile uses.[34] Accordingly, there appears to be sufficient spectrum at present, or which can be made available in the near term, in which to place mobile transmitters for advanced wireless services.[35]

VI. CONCLUSION

For the reasons expressed herein, the ITFS Community urges the Commission not to disturb the existing allocation or use of the ITFS/MDS spectrum, and to choose an alternative that does not involve reallocation or displacement of ITFS/MDS licensees for the implementation of 3G services.

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34 *See Notice* at ¶ 37 (120 MHz in 1850-1910/1930-1990 MHz band); ¶ 38 (60 MHz in 746-806 MHz band); ¶ 41 (45 MHz in 1710-1755 MHz band); ¶ 52 (40 MHz in 2110-2150 MHz band). Although the Educators do not hold licenses for spectrum in the 2150-2162 MHz bands, this band, currently allocated to MDS Channels 1 and 2, is an essential component of the two-way systems now being designed and implemented by commercial MDS entities. Accordingly, neither this band, nor the upper 2 MHz from 2160-2162 MHz, should be reallocated for 3G mobile use. *See Id.* at ¶ 55.

35 120 MHz of the spectrum identified above is already allocated to PCS (1850-1910/1930-1990 MHz). However, it is anticipated that some of the demand for mobile 3G services will be satisfied through in-band migration of existing PCS systems to 3G. In addition, the PCS C and F blocks, constituting 40 MHz of this allocation, already have been reauctioned. *Id.* at ¶ 37. Therefore, it is appropriate to count this spectrum towards the bandwidth for 3G.

Respectfully submitted,

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On behalf of itself and the organizations listed in the attached Appendix A.

February 22, 2001

Appendix A
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5930 Middle Fiskvillle Road
Austin, TX 78752

Northeast Texas Community College
Barbara Romine
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Mt. Pleasant, TX 75456

Concordia University at Austin
David Kluth
3400 IH-35 North
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Comfort Independent School District
Marlan Markham
P.O. Box 398232 High Street
Comfort, TX 78013-0398

Roman Catholic Diocese of San Angelo
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P.O. Box 1829804 Ford Street
San Angelo, TX 76902-1892

Westwood Medical Center
Randy Slack
4214 Andrews Hwy.
Midland, TX 79703

Springlake-Earth Independent School Dist.
Robert Conkin
Junction of FM 2901 & FM 302PO Box 130
Earth, TX 79031-0130

Lampasas Independent School District
Ronnie Kincaid
207 West 8th Street
Lampasas, TX 76550

Kerens Independent School District
Vance Vaughn
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Evant Independent School District
William Brister
101 Memory LaneP.O. Box 339
Evant, TX 76525-0339

Catholic Diocese of Amarillo
Joseph Bixenman
1800 North Springs
Amarillo, TX 79107

Fredericksburg Independent School Dist.
Susan Hatfield
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Fredericksburg, TX 78624

Education Service Center Region 18
Brian LaBeff
2811 LaForce Blvd.
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